

E-filed 5/1/06

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ATTORNEYS FOR STATECO INC. AND
THOMAS NATOLI

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

M. DIANE KOKEN, Insurance Commissioner of the
Commonwealth of Pennsylvania, acting in her official
capacity as Statutory Liquidator of Legion Insurance
Company and Villanova Insurance Company,

Plaintiff,

vs.

STATECO INC. dba STATECO INSURANCE
SERVICES and THOMAS NATOLI, and XYZ
CORPS. 1-10, and DOES 1 through 10, Inclusive,

Defendants.

AND RELATED CROSS-ACTION.

No. C 05 3007 - JF

**STIPULATION AND [PROPOSED]
ORDER EXTENDING
DEFENDANTS STATECO AND
THOMAS NATOLI'S TIME TO
FILE AN AMENDED COUNTER
CLAIM**

Defendants and Counter-Claimants Stateco Inc., doing business as Stateco Insurance Services, and Thomas Natoli (collectively the "Stateco Defendants") and Plaintiff and Counter-Defendant M. Diane Koken, ("Koken") by and through their undersigned counsel, hereby stipulate as follows:

1. WHEREAS Stateco filed its Amended Answer and Counterclaim ("Counterclaim") on or about December 19, 2005; and

2. WHEREAS on or about January 5, 2006, Koken filed a motion to dismiss Stateco's

1 Counterclaim ("Motion to Dismiss"); and

2 3. WHEREAS, after a hearing on the Motion to Dismiss, the Court entered its Order
3 Granting Motion to Dismiss With Leave To Amend on or about April 4, 2006 (the "Order"); and

4 4. WHEREAS, the Order required that any amended counterclaim should be filed
5 within twenty days of the Order; and

6 5. WHEREAS the Stateco Defendants have requested an extension of time to file their
7 amended counterclaim; and

8 6. WHEREAS the extension requested by the Stateco Defendants will not affect any
9 court-ordered scheduling deadlines;

10 IT IS PROPOSED AND STIPULATED:

11 The date set for the Stateco Defendants to respond to amend their counter-claims will be
12 extended from April 24, 2006 to May 1, 2006.

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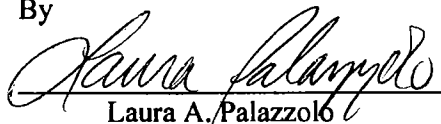
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1 IT IS SO STIPULATED.

2
3 DATED: April 24, 2006

BERLINER COHEN

6 By

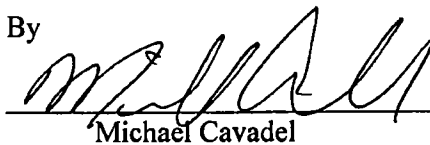
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8 Laura A. Palazzolo

9 Attorneys for Defendants and Cross-
10 Complainants STATECO INC., dba STATECO
11 INSURANCE SERVICES and THOMAS
12 NATOLI

13 DATED: April 24, 2006

14 WOLF, BLOCK, SCHORR and SOLIS-
15 COHEN LLP

16 By

17 
18 Michael Cavadel

19 Attorneys for Plaintiff Counter-Defendant M.
20 DIANE KOKEN

21 IT IS SO ORDERED

22 DATED: May 1, 2006

23 By

24 
25 Jeremy Fogel
26 United States District Court Judge
27 United States District Court Judge
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